

STATEMENT OF QUALIFICATIONS (SOQs)

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1.0 ABOUT COTTONWOOD

Cottonwood Consulting LLC (Cottonwood) provides a wide variety of cost-effective environmental consulting services to its clients. With over 24 years of combined experience in the environmental and oil and gas industry, the Cottonwood team provides results to meet its clients' needs in a safe and efficient manner.



Cottonwood is a full-service environmental firm specializing in assessment, sampling, and technical evaluation of environmental conditions. The Cottonwood team provides services to both the public and private sector. These services include:

- Water/Soil/Air Sampling
- Domestic Water Well Sampling
- Natural Spring Sampling
- Groundwater Sampling
- Surface Water Sampling
- Soil Gas Surveys
- Inspections/Inventories
- SPCC Plans

- Spill Response and Reporting
- Stormwater Management
- NEPA Compliance
- Biological Surveys
- Permitting
- Phase I/II ESAs
- Section 404 Clean Water Act
- SARA Title III Reporting

As an owner-operated consulting firm, Cottonwood is committed to client service and professional integrity. The owners of Cottonwood consist of a licensed Professional Geologist and a Senior Biologist with vast experience in environmental compliance across multiple industries. Cottonwood was formed in 2014 and is a registered LLC in the State of Colorado and New Mexico. Cottonwood has worked in a number of geographical areas and implemented projects at the county, state, and federal level.

Contact Information:

Cottonwood Consulting LLC

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2.0 WATER SAMPLING

Water quality sampling and evaluation are a Cottonwood specialty. Cottonwood prides itself on high-quality sampling techniques that ensure representative samples collected using best industry practices.

Whether it is part of a monitoring program associated with oil and gas development, compliance testing, or a response to an environmental incident, Cottonwood's team of trained environmental samplers can collect samples to meet its clients' needs every time. Cottonwood also has the technical knowledge and experience to conduct water quality evaluation based on the results.



2.1 Domestic Water Well Sampling



Impacts to groundwater have become one of the most significant concerns associated with oil and gas development. Cottonwood provides domestic water well sampling services to establish baseline conditions and to evaluate potential changes in groundwater quantity and quality over time. These groundwater monitoring programs are typically implemented as a requirement of a regulatory agency or as an internal best management practice. Cottonwood's ability to work with its clients, regulatory officials, and landowners has resulted in successful execution of numerous groundwater monitoring programs.

Cottonwood provides water well sampling services associated with a variety of regulations and voluntary programs including:

- Colorado Oil and Gas Conservation Commission (COGCC) Rule 608
- COGCC Rule 609
- New Mexico Oil & Gas Association (NMOGA) Voluntary Baseline Sampling Guideline
- Private Homeowner Sampling

Cottonwood's relevant project experience includes:

- Sampling per Rule 608 in San Juan and Piceance Basins (200+ samples);
- Creation and implementation of NMOGA Voluntary Baseline Sampling program in New Mexico;



- Sampling per Rule 609 in San Juan and Piceance Basins;
- Numerous private homeowner tests in a variety of basins.



2.2 Other Water Sampling Services

In addition to domestic water well sampling, Cottonwood provides a number of other water sampling services to the public and private sector including:

- Surface water sampling streams, ponds, irrigation water;
- Natural spring sampling;
- Industrial water sampling; and
- **Public water supply** system sampling.





Cottonwood's relevant project experience includes:

- Sampling of numerous streams, ponds, and springs in various locations throughout Colorado;
- Sampling of water wells as potential source water for oil and gas development in the San Juan Basin, New Mexico;
- Sampling of water for a rural water system in Southwest Colorado;
- Sampling of water at pit facilities in the Piceance Basin; and
- Sampling of irrigation ditch water in La Plata County, Colorado.

3.0 SPILL RESPONSE AND REPORTING

Cottonwood has significant experience in spill response, assessment, reporting, monitoring, remediation, and reclamation. By understanding the unique regulatory framework of its clients' industries, Cottonwood can help ensure compliance with relevant rules in an efficient and cost-effective manner. Cottonwood can respond quickly to spills in order to assess the potential impacts and report within the required timeframe.

The Cottonwood team provides soil sampling services that result in environmental samples of the highest integrity. Cottonwood also has a thorough understanding of remediation techniques and can work with construction crews to efficiently address impacts in a manner that takes into account both environmental compliance and economic considerations.

Cottonwood has experience with reporting requirements relevant to a number of regulatory entities including, but not limited to: the **COGCC**, **NMOCD**, **BLM**, and the Southern Ute Indian Tribe.







3.0 SPILL RESPONSE AND REPORTING (Continued)

Cottonwood's **relevant project experience** related to spill response includes:

- Spill response and reporting for CBM produced water releases in the San Juan Basin, Colorado;
- Sampling and assessment at an underground injection facility in the Piceance Basin, Colorado;
- Confirmation sampling at excavation sites related to releases of lube oil, condensate, and produced water in oil and gas development areas; and
- Sampling, assessment, and remediation of impacts to an irrigation ditch following the release of produced water in Southwest Colorado.



4.0 SOIL GAS SURVEYS



Methane was not detected alwayof the gas measurement locations Fugitive methane emissions are a concern from a health and safety, greenhouse gas, water quality, and economic standpoint. Cottonwood conducts soil gas surveys to evaluate the presence of fugitive emissions near oil and gas facilities and geologic outcrops. After evaluating the spatial distribution and potential cause of seeps, Cottonwood prepares plans to mitigate environmental impacts and minimize the loss of the resource when possible:

Cottonwood's **relevant project experience** related to soil gas surveys includes:

- Numerous soil gas surveys in the vicinity of **P&A wells** in the San Juan Basin, Colorado;
- Follow-up soil gas surveys conducted in response to the identification of methane seepage during aerial surveys; and
- Methane seep surveys in areas of stressed vegetation in oil and gas developments areas.



5.0 STORMWATER MANAGEMENT

Cottonwood provides stormwater management services for the oil and gas, commercial, transportation, and mining industries. Cottonwood understands the relevant state and federal regulations associated with stormwater water management during construction activities across the Rocky Mountain region.

Cottonwood provides the full spectrum of stormwater management services including Stormwater Pollution Prevention Plans (SWPPPs), permitting, inspections, and reclamation plans.

Cottonwood's relevant project experience includes:

- Stormwater inspections at over 40 facilities including well pads, pipelines, compressor stations, etc. in Southwest Colorado;
- Stormwater management for a large scale pipeline gathering system in the Piceance Basin, Colorado; and
- Reclamation monitoring of a 20+ mile pipeline on the Western Slope of Colorado.





6.0 NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) COMPLIANCE





Cottonwood provides services associated with the *National Environmental Policy Act of 1969 (NEPA)*. With an extensive knowledge of oil and gas exploration and production on both Federal and Indian lands, Cottonwood uses its experience in the oil and gas industry to make the NEPA process efficient and accurate. Cottonwood understands its clients' proposed development scenarios and prepares the appropriate NEPA documents accordingly. Cottonwood's NEPA and other related services include:

- Determination of NEPA approach;
- Drafting of creative Alternatives;
- Preparation of Environmental Assessments/Categorical Exclusions;
- Threatened & Endangered (T&E) Species Surveys;
- Biological Assessments (BAs); and
- Endangered Species Act (ESA) compliance.

Cottonwood's relevant project experience includes:

- Preparation of EA's for oil and gas facilities in the San Juan Basin
- Geology and Groundwater sections for a Supplemental EIS for shale O&G development (ongoing)

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7.0 BIOLOGICAL SERVICES

Review of biological resources is a crucial part of both the NEPA process and compliance with the Endangered Species Act (ESA). With significant experience in conducting Biological Assessments and Threatened and Endangered (T&E) Species Surveys, the Cottonwood team understands the biological resources within specific development areas and assesses potential impacts accordingly.

Cottonwood's biological services include:

- Preparation of Biological Assessments;
- Endangered Species Act Compliance;
- T&E Surveys;
- Vegetation Surveys;
- Reclamation Monitoring;
- Weed Management;
- Migratory Bird Treaty Act Compliance; and
- Wildlife/Habitat Impact Mitigation.

Cottonwood's relevant project experience includes:

- Biological evaluation for 80-Acre CBM wells in the San Juan Basin;
- Vegetation monitoring along a large scale pipeline in the Piceance Basin;
- Numerous vegetation transects on the Western Slope, Colorado; and
- Weed Management at O&G facilities in multiple fields across Colorado.

8.0 WELLBORE INTEGRITY / BRADENHEAD INSPECTIONS

Cottonwood provides management of wellbore integrity programs for the oil and gas industry. An experienced team of testing and sampling personnel ensures an accurate pressure test and a representative sample collected in a safe manner. Cottonwood collects samples for gas composition and isotopic analysis.

Cottonwood's relevant project experience includes:

- Gas sampling at oil and gas facilities in the San Juan Basin, Colorado; and
- Bradenhead testing at natural gas wells in the San Juan Basin, Colorado.











9.0 INSPECTIONS / INVENTORIES

Cottonwood conducts inspections and inventories of oil and gas facilities to help its clients understand on-site conditions. During inspections, Cottonwood documents all environmental issues on-site including soil staining, erosion, leaking tanks, etc. During inventories, Cottonwood creates a database of equipment on-site so its clients can track the location of tanks, separators, artificial lift units, dehydrators, compressors, etc. Cottonwood offers inspections for a variety of programs including stormwater management and SPCC plans.



Cottonwood's relevant project experience includes:

- Inspections at oil and gas facilities in the Paradox Basin, Colorado;
- Inspections at large scale gathering system in the Piceance Basin, Colorado.

10.0 SPILL PREVENTION, CONTORL, COUTERMEASURE (SPCC) PLANS



Preventing and controlling hydrocarbon spills is one of the most important tasks when minimizing environmental liabilities. Cottonwood prepares SPCC plans for oil storage facilities in accordance with relevant state and federal laws as well as individual company standards. Cottonwood has the necessary experience with SPCC issues in order to implement site inspections in an efficient manner and guarantee fast turnaround of SPCC plans.

11.0 PERMITTING

Cottonwood provides permitting services related to oil and gas development. By understanding the relevant processes and regulatory structure, Cottonwood ensures that permitting occurs in a timely manner. Cottonwood's permitting services include Applications for Permit to Drill (APDs); Rights-of-Way (ROW); Section 404 Clean Water Act; Stormwater permits; sundry notices; COGCC, BLM, BIA, NMOCD forms; and many other permits/notices/forms.

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12.0 SUPERFUND AMENDMENTS AND REAUTHORIZATION ACTS (SARA) TITLE III REPORTING

The Cottonwood team has significant experience in management, tracking, and reporting of chemicals. Having implemented SARA Title III programs for a major oil and gas company, the Cottonwood team understands how to acquire the necessary information and report chemicals in a timely fashion in compliance with federal law. Cottonwood helps its clients comply with Tier II reporting as well as Toxic Release Inventory (TRI) reporting.

13.0 HEALTH AND SAFETY

Performing jobs and tasks safely is Cottonwood's number one priority. No job is worth compromising anyone's personal health and safety. Safety culture within the oil and gas industry has made significant strides forward during the last few decades and Cottonwood is committed to continuing this forward progress. In addition to maintaining all general oil and gas safety training for all its personnel, Cottonwood also works with its clients to understand their individual safety programs. This allows for safety expectations to be clearly defined across the board.





Cottonwood's safety protocol is available at upon request or at www.cottonwoodconsulting.com

14.0 CONTACT INFORMATION

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